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Efficasey Environmental, LLC

Efficacy, n., "Power to produce the intended effect."

Terry S. Casey 14015 Park Drive, Suite 109 Tomball, TX 77375 Phone: (281) 351-9441 Fax: (281) 351-9447



February 8, 2001

Ms. Gwen Massenberg USEPA – Region 5 Remedial Response Branch 77 W. Jackson Blvd., SR-6J Chicago, IL 60604-3590

Dear Gwen:

Per our discussion, NL recommends the following modification to the SOW. Specifically, we recommend, for the reasons discussed, that the sentence:

"The Respondent must excavate all on-property soil that is not under the cover system and that exceeds the risk goal for the site (and is not historic slag) and treats that soil to the Land Disposal Restrictions (LDR) Alternate Performance Standards, 40 CFR 268.49©()(B)(C)."

Be changed to:

"The Respondent must excavate all on-property soil that is not under the cover system or existing concrete surface and that exceeds the risk goal for the site (and is not historic slag) and treats that soil to the Land Disposal Restrictions (LDR) Alternate Performance Standards, 40 CFR 268.49©()(B)(C). This does not include areas that have been excavated during the approved Phase I TCR that were covered with two feet of clean backfill following removal of the lead-impacted soils."

Please call with any questions.

Respectfully,

Terry S. Cases

TSC:krr

cc:

Patricia Vojack Marcus Martin

Rachel Schneider